

# KLARIS

March 20, 2025

**VIA ECF**

Hon. Gabriel W. Gorenstein  
United States Courthouse  
500 Pearl St.  
New York, New York 10007

Re: Ramales Photography LLC v. MediaNews Group, Inc., No. 1:25-v-00627 (DEH) (GWG)

Your Honor:

This firm represents Defendant MediaNews Group, Inc. (“MNG”) in the above-referenced matter. I write to respectfully request a 30-day extension of MNG’s time to respond to the Complaint, to and including April 23, 2025. The response is currently due on Monday, March 24, 2025. The extension is requested because MNG is continuing to review the claim and the factual background and needs additional time before submitting a response.

This is the second request for an extension. Counsel for Plaintiff consents to this request, which will not affect any other deadlines.

Respectfully submitted,

/s/ Matthew A. Leish

cc: Renee Aragona, Esq. (via ECF)